

LAW OFFICE OF SARAH KUNSTLER

315 FLATBUSH AVENUE #103 • BROOKLYN, NEW YORK 11217

(718) 783-3682 • FAX (347) 402-2014 • KUNSTLERLAW.NET

November 10, 2020

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The Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Philip Reichenenthal
20 Cr. 00578 (LAK)

MEMO ENDORSED

Dear Judge Kaplan:

I am the CJA attorney appointed to represent Philip Reichenenthal in the above-captioned matter. I write to respectfully request a temporary bail modification – the removal of Mr. Reichenenthal's electronic monitoring device – so that Mr. Reichenenthal can undergo necessary surgery. The government and Probation consent to this request.

Mr. Reichenenthal was arrested in the Southern District of Florida on September 14, 2020. He was released on a \$500,000 personal recognizance bond secured with his signature, as well as strict supervision and electronic monitoring. I was appointed on September 29, 2020, and bail was continued in this district under the same terms. Mr. Reichenenthal has been fully compliant with the terms of his release.

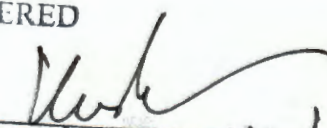
Mr. Reichenenthal, who resides in Florida, has cancer in both kidneys, and is scheduled for pre-operative testing on December 9th, and for surgery to remove the tumors from one of his kidneys on December 12th. He expects to spend several days in the hospital post-surgery. Because an MRI cannot be conducted with an electronic monitoring bracelet in place, and because there is concern that the device will interfere with the equipment used during surgery, we are asking for the device to be temporarily removed. The requested period of the modification is from December 8, 2020, the day before Mr. Reichenenthal's early-morning testing on December 9, 2020, until approximately December 14, 2020, or whenever Mr. Reichenenthal is discharged from the hospital. Mr. Reichenenthal would contact Probation as soon as he knows his exact date of discharge to make arrangements for the reinstallation of the monitoring device.

Thank you for your kind consideration of this request.

Respectfully submitted,



Sarah Kunstler
Attorney for Philip Reichenenthal

Granted on Consent
SO ORDERED

LEWIS A. KAPLAN, USPTO 11/10/2020